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Chapter 9 Counsel for Tulare Local Healthcare District, Debtor

IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA  
FRESNO DIVISION

In re

CASE NO. 17-13797

TULARE LOCAL HEALTHCARE  
DISTRICT, dba TULARE REGIONAL  
MEDICAL CENTER,

Chapter 9

DC No.: WW-87

Debtor.

Date: April 25, 2019

Time: 9:30 a.m.

Tax ID #: 94-6002897

Place: 2500 Tulare Street

Address: 869 N. Cherry Street  
Tulare, CA 93274

Fresno, CA 93721  
Courtroom 13

Judge: Honorable René Lastreto II

**DEBTOR'S OBJECTION TO PROOF OF CLAIM NUMBER 137  
FILED BY BB&T INSURANCE SERVICES, INC.**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE AND OTHER  
PARTIES IN INTEREST:

Pursuant to 11 U.S.C. § 502 and FRBP 3007, Tulare Local Healthcare District dba Tulare Regional Medical Center (the "Debtor") objects to Proof of Claim Number 137 (the "Claim") filed by BB&T Insurance Services, Inc. ("BB&T"). This objection is based on the following:

1. Prior to filing bankruptcy, the Debtor was under the management and control of Healthcare Conglomerate Associates, LLC ("HCCA"). Among HCCA's

1 responsibilities was to see to the administration of insurance benefits for employees.  
2 The Debtor had no employees of its own.

3 2. The Debtor commenced a voluntary bankruptcy petition under Chapter 9  
4 of the Bankruptcy Code on September 30, 2017 (the "Petition Date"), in the Eastern  
5 District of California and obtained an order rejecting the contract with HCCA on  
6 November 1, 2017.

7 3. The claims bar date was set as April 10, 2018.

8 4. On February 28, 2018, BB&T filed Proof of Claim 137 in the total amount  
9 of \$41,666.64. This Proof of Claim was for insurance consulting fees rendered to  
10 HCCA from June 1, 2017 through September 1, 2017. A copy of Proof of Claim  
11 Number 137 is attached as Exhibit "A".


12 5. The Debtor objects to BB&T's claim on the basis that during the period  
13 for which the claim is asserted it was HCCA and not the Debtor who was responsible  
14 for these insurance consulting fees and the Debtor has no responsibility for this claim.

15 WHEREFORE, the Debtor respectfully requests that this Objection be sustained  
16 and the Proof of Claim Number 137 filed by Claimant be disallowed in its entirety and  
17 seeks such other and further relief as is just and proper.

18 Dated: 3/2, 2019

WALTER WILHELM LAW GROUP,  
a Professional Corporation

20  
21 By:

  
Riley C. Walter, Attorneys for Debtor,  
Tulare Local Healthcare District dba Tulare  
Regional Medical Center